

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
vs.) NO. 04-30055-MAP
)
KACEY JONES)

MOTION TO BE PROVIDED WITH INTERNAL INVESTIGATION REPORTS
RELEVANT TO A GOVERNMENT WITNESS

Now comes the defendant and respectfully requests this Honorable Court order the U.S. Attorney's Office to identify any internal investigations by any State, Federal, or Local law enforcement agencies into the allegations that Officer Michael Trombley filed false police reports or gave false testimony in a Juvenile Court Hearing or to a Hampden County Superior Court Grand Jury.

The defendant, in addition to asking the U.S. Attorney to identify if there have been any internal investigations also asks to order the results and material generated during those investigations be turned over to the defendant. The defendant asserts this information is vital to the defendants impeaching the credibility of a key Government witness. The defendant asserts Officer Trombley is the key witness in this case as he testified at a Motion to Suppress Hearing he was the individual who saw the defendant reaching for a handgun and flushing drug evidence down the toilet. Although other officers were present, it was Trombley who clearly was the officer who was the primary witness to the events charged in this indictment.

The defendant incorporates by reference the fact outlined dealing with Officer Trombley's credibility issue in defendant's Motion to Reopen Suppression Hearing.

Respectfully submitted,

THE DEFENDANT

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CERTIFICATE OF SERVICE

I, Mark G. Mastroianni, Esq., do hereby certify that I have served a copy of the foregoing via CM/ECF to AUSA Paul Smyth, 1550 Main Street, Springfield, MA 01103 this 13 day of March 2006.

/s/ Mark G. Mastroianni
